

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:25-cv-1675

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ANDREA K. TANTAROS

Plaintiff;

-against-

FOX NEWS NETWORK, LLC, FOX CORPORATION,
INC., WILLIAM SHINE, JOHN FINLEY, SCOTT
BROWN, ELIZABETH AILES ON BEHALF OF
THE ESTATE OF ROGER AILES.

Defendants.

_____^x

The following Affidavit of Service confirms Proof of Service to all Defendants named in the original complaint under the Federal Rules of Civil Procedure.

The Affidavit of Service was timely-filed on On May 26, 2025 (See Exhibit 1) with the Pro Se Intake office at 5:31 p.m. EDT. (See Exhibit 1 – “Filed Affidavit of Service with Pro Se Intake Office, May 26, 2025”).

Plaintiff received a confirmation email “Acknowledgment of Receipt” confirming the document was received at 5:32 p.m. EDT. (See Exhibit 2 – Acknowledgment of Receipt from Pro Se Intake Office, May 26, 2025”).

Dated: June 6, 2025

/s/ Andrea K. Tantaros

Andrea K. Tantaros, Plaintiff

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT

Andrea K. Tantaros,

Plaintiff.

v.

Case No. 1:25-cv-1675

Fox News Network, LLC, Fox Corporation,

John T.A. Finley, Scott Brown, William Shine,

Elizabeth Ailes as Executor of The Estate of Roger Ailes.

Defendants.

AFFIDAVIT OF SERVICE

I, Andrea K. Tantaros, being duly sworn, depose and state as follows under penalty of perjury:

1. I am the Plaintiff in the above-captioned matter and am over the age of 18.
2. I submit this Affidavit in support of my compliance with Federal Rule of Civil Procedure 4(l), and in further support of my concurrently filed protective motion for alternative service under FRCP 4(f)(3) and CPLR § 308(5).
3. Between May 21 and May 24, 2025, I served true copies of the Summons and Complaint on known counsel of record for each named Defendant or individual Defendants in this action using a combination of USPS Certified Mail, UPS Overnight Delivery, and electronic mail to both known counsel of record and Defendants following due diligence.
4. On May 21, 2025, at 11:34 a.m. and 11:43 a.m. EDT, I transmitted the Complaint, Summons, along with a formal Waiver of Service Form pursuant to FRCP 4(d), via email to the following known counsel representing the following Defendants in ongoing litigation (Case No. 1:25-cv-961, American Arbitration Association (“AAA”) Case No. 01-16-0001-7288):

Paul C. Evans, Counsel for Fox News Network, LLC and Fox Corporation

Email: paulevans@paulhastings.com

Krissy Katzenstein, Counsel for Fox News Network, LLC and Fox

Corporation Email: krissykatenstein@paulhastings.com

Marion Bachrach, Counsel for William Shine

Email: Marion.bachrach@hklaw.com

Jonathan Halpern and Elliot Magruder, Counsel for William Shine

Emails: Jonathan.halpern@hklaw.com elliot.magruder@hklaw.com

- Erin Kormann – Counsel for John T.A. Finley

Email: ekormann@franzschur.com

4. The counsel for Fox News Network, LLC, Fox Corporation (“The Fox Entities”) and William Shine represent the above-named parties in Case No. 1:25-cv-961 (SDNY) and AAA Case No. 01-16-0001-7288, and have routinely communicated with me via email and certified mail in those matters.
5. Ms. Kormann responded on May 21, 2025 at 4:17 p.m. stating: “I am not authorized to accept or waive service on behalf of John Finley.”
6. Ms. Kormann represented John Finley (“Finley”) during his investigation and subsequent firing from Fox News Network, LLC in September of 2023 following sexual harassment, sexual misconduct and stalking allegations.
7. Despite prior cooperation, including acceptance of waiver of service for their clients in Case No. 1:25-cv-961, the attorneys representing The Fox Entities and William Shine listed above did not respond to the request whatsoever to waive service, nor was any bounce-back email, undeliverable message or out-of office response received.
8. Their refusal to reply or acknowledge the communication appears to be a deliberate attempt to obstruct and frustrate service, in bad faith, and with the possible intent to later contest proper service under Rule 4(m) or Rule 12(b)(5). These parties received actual notice of the lawsuit, are fully aware and chose to remain silent despite clear opportunity to cooperate.
9. On May 23, 2025, I served a true and correct copy of the Summons and Complaint via UPS Overnight Mail to their addresses of public record and simultaneous due diligence:
*John T.A. Finley
55 Bank Street
Unit 721
White Plains, NY 10606
*Scott Brown
33 Ocean View Avenue
Rye, NH 03870

Tracking and delivery confirmations were received on May 24, 2025 at 9:50 a.m. (John Finley) and 10:56 a.m (Scott Brown), respectively.

10. On May 24, 2025, I served a true and correct copy of the Summons and Complaint via USPS Certified Mail with tracking, delivery confirmation and signature required to:

Fox News Network, LLC
Katherine Moran Meeks, General Counsel
1211 Avenue of the Americas
New York, NY 10036

Fox Corporation
Adam Ciangoli, General Counsel
1211 Avenue of the Americas
New York, NY 10036

William Shine
14811 Como Circle
Bradenton, FL 34202

Elizabeth Ailes
The Estate of Roger Ailes
6 Ocean Lane
Palm Beach, FL 33480

Marion Bachrach (Counsel for William Shine)
Holland & Knight
737 Seventh Avenue
New York, NY 10019

Paul Evans (Counsel for Fox News Network, LLC, Fox Corporation via UPS delivery)
Paul Hastings, LLP
200 Park Avenue
New York, NY 10166

11. These efforts were timely made within the 90-day deadline imposed by Rule 4(m) and reflect diligent, good-faith attempts to serve all named Defendants. Any and all receipts and efforts are memorialized as evidence.
12. This affidavit is submitted in compliance with FRCP 4(l)(1) and in further support of my protective motion for alternative service, in the event that any Defendant or the Court later challenges the sufficiency of service.
13. This affidavit is submitted with the intent to uphold procedural fairness and ensure all parties are properly on notice of this action.
14. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of May, 2025.

Signature: 

Andrea K. Tantaros, Plaintiff

Andrea K. Tantaros
302A West 12th Street
Suite 120
New York, NY, 10014

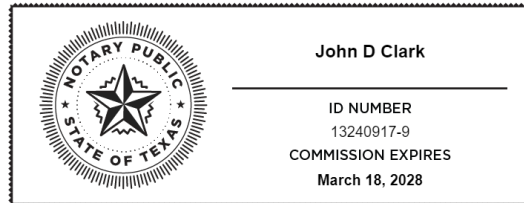
IN THE STATE OF TEXAS, COUNTY OF TARRANT, appeared: Andrea Tantaros
Sworn to and subscribed before me this 26th day of May, 2025.

Notary Public, State of Texas

Notary Public: 

My Commission Expires: 03/18/2028

Date: 05/26/2025



Electronically signed and notarized online using the Proof platform.